



*Experience the Joy of Brilliant Printed Packaging*

March 5, 2009

Laura D. Routh, CHMM  
Waste Management Program  
Bureau of Environmental Field Services  
Kansas Department of Health & Environment  
800 W. 24<sup>th</sup>  
Lawrence, Kansas 66046



RE: <sup>per Jones</sup> ~~June 29, 2004~~ Hazardous Waste Compliance Inspection  
Robbie Manufacturing Inc.; Lenexa, KS; Johnson County  
EPA ID Number: KSD054080148

RECEIVED

MAR 06 2009

KD.H.E.

NORTHEAST DISTRICT OFFICE

Dear Mrs. Routh

Re: On February 10-11, 2009 Compliance Inspection at Robbie Manufacturing, Inc.  
Lenexa, Johnson County, EPA ID# KSD 054 080 148

**Violation 1: Failure to determine if waste is hazardous waste K.A.R. 28-31-4(b)**

Fluorescent lamps currently being discarded in the trash

**Corrective action:** Recycling program has been developed and documented for  
Fluorescent lamps as a Universal Waste. The Program is in effect starting March 1, 2009.

**Violation 2: Failure to mark storage container of hazardous waste K.A.R. 28-31-4(g)(3)**

Unmarked 55-gallon drum of solvent waste observed in the central storage area

**Corrective action:** Label replaced at time of inspection.

**Violation 3: Failure to close each satellite accumulation container of hazardous waste except when adding or removing waste.**

One 55-gallon metal drum with an open funnel lid, observed in the satellite collection area.

**Corrective action:** Funnel lid cleaned of build-up of ink so cover can be latched. More attention will be given to this issue during weekly inspection; any issues will be noted on the form. New funnels have been ordered so we can change out funnel when a full drum is closed and moved to the 90 day storage area. Additional funnels will be at Robbie no later than April 1, 2009.

**Violation 4: Failure to adhere to requirements for training per K.A.R. 28-31-4(g)(4)/40 CFR 265.16(d)(3).** The Company's training documents did not include the following required elements:



- a) Job title for each position related to hazardous waste management and the name of the employee filling each job.

**Corrective action:** All job titles of persons dealing with hazardous materials and the names of persons filling the positions have been included in the training manual as of March 1, 2009

- b) Not all job descriptions identify the type and amount of training to be given to employee(s).

**Corrective action:** Job descriptions will include statement about annualized training for management of hazardous waste as a requirement. Job descriptions will be updated by March 27, 2009.

- c) Not all job descriptions described in training plan were produced during inspection (including job description for George Jones)

**Corrective action:** All job descriptions have been found and will be included in Training Plan after being updated. Job descriptions will be in the plan no later than April 1, 2009

- d) Not all job descriptions include a description of hazardous waste duties.

**Corrective action:** Specific responsibilities pertaining to hazardous waste management by position have been identified and documented and will be included in job descriptions as of March 27, 2009

- e) Company did not produce demonstration of annual training for George Jones or Dave Wagner.

**Corrective action:** We are currently reviewing that we have the right person selected as back up for managing our Hazardous Waste program. That review will be completed by March 20, 2009. After the review has been completed training will be contracted to Trinity Consultants by April 1, 2009

#### **Concern 1:**

The facility has a single spill kit identified in its contingency plan, located in the ink room. During the inspection, I observed that this spill kit is a significant distance from the other waste storage areas in the plant. I recommended that Robbie Manufacturing consider placing spill control equipment in those areas of the plant where large quantities of hazardous waste are being accumulated or stored.

**Response:** We are reviewing the locations for collection drums and are going to relocate them but I don't believe there will be a significant reduction in distance. I believe there is more of a chance a spill would occur at a collection point than in the 90 day storage area. If you are in agreement we would purchase additional spill kit to be at the collection point and note in our Contingency Plan

#### **Concern 2: Management of solvent-saturated rags, pre-centrifuge**

On the day of the inspection, I observed multiple collection containers holding solvent-saturated rags. These were described as pending centrifuge processing by Walker Towel. The containers of rags observed were not labeled with the words "hazardous waste". At the time of the inspection the applicability of K.A.R. 28-31-4(g)(3) to the containers observed was unclear. This issue has been forwarded to the Bureau of Waste Management (BWM) for their review and interpretation.

**Response:** Soiled rags are kept in covered containers waiting centrifuge. After centrifuge the rags are placed back in the containers until Walker Towel exchanges for clean rags. The clean rags are placed back into the containers the soiled rags were removed from. I am not clear what type labeling would encompass the process

**Concern 3: Marking of waste solvent tank**

On the day of the inspection, I observed a standing tank described as a collection vessel for hazardous waste solvent. The tank was not marked. At the time of the inspection the applicability of K.A.R. 28-31-4(g)(3) to this tank was unclear. This concern has been forwarded to the Bureau of Waste Management (BWM) for their review and interpretation..

**Response:** The tank in question is part of the automatic clean-up system on the F&K press. Solvent is used to clean the print chambers and stored in one tank. This solvent is used for 2-3 change out of different ink colors and then pumped into the tank in question. The solvent is then pumped into the tote containing hazardous waste and labeled hazardous waste. As with other containers within Robbie I believe this should be labeled Press wash.

Respectfully,



George Jones

Robbie Manufacturing Inc.